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October 14, 2011

*Application  
granted.*

VIA ECF

Magistrate Judge Mann  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**SO ORDERED:**

/s/

**Roanne L. Mann**  
**U.S. Magistrate Judge**

**Dated:** 10/14/11

Re: Gerardo Valdez Lujan et al. v. Cabana Management, Inc. et al.  
Docket No. 1:10-cv-00755 (ILG) (RLM)

Dear Magistrate Judge Mann:

We represent the defendants, and submit this joint request from the parties.

The parties have continued serious good faith efforts to negotiate a settlement of this lawsuit. The parties have engaged in continuing in-person settlement discussions. On October 11, 2011 Defendant Glenn Frechter together with Elisa Frechter flew in from Florida to meet with all counsel. The Defendants recently settled claims of three opt-in plaintiffs and have made new good faith proposals to resolve all further issues in dispute.

Plaintiffs' counsel has advised that Plaintiffs are reviewing Defendants' proposal, and expect to have comments and proposed revisions for Defendants' consideration by "early next week".

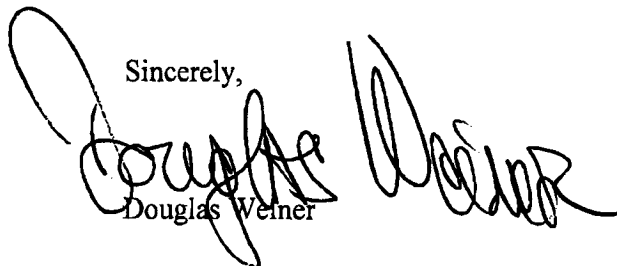
In view of these active and ongoing settlement negotiations, the parties jointly request a 14 day extension of the last remaining deadlines for briefing Plaintiffs' motion to strike Defendants' Declarations, which was filed October 5, 2011. Currently Defendants' response is due October 19 and Plaintiffs' Reply is due October 28. Rather than engage in further motion practice at this time, the parties jointly request those deadlines be extended to November 2 and November 9 respectively.

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Thank you for your courtesy in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas Weiner", is written over the printed name. The signature is fluid and cursive.

Douglas Weiner

cc: Lloyd Ambinder, Esq.